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10 Center of Southern Nevada Pro Bono Project

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 JUSTIN L. TRIPP,  
14 Plaintiff,  
15 vs.  
16 CLARK COUNTY, et al  
17 Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

18 **STIPULATION AND ORDER TO**  
19 **EXTEND TIME FOR PLAINTIFF TO**  
20 **RESPOND TO DEFENDANTS' FOUR**  
21 **MOTIONS FOR SUMMARY**  
22 **JUDGMENT**  
23 **(First Request)**

24 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law  
25 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza,  
26 Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacquelyn  
27 Schumaker and Defendants LVMPD Sergeants' (hereinafter "Defendants") by and through their  
28 counsel, the law firm of Kaempfer Crowell, hereby stipulate and agree to extend the time for  
Plaintiff to Respond to the following Defendants' Motions for Summary Judgment, due on May  
17, 2021, to July 16, 2021:

1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];
2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment [ECF #199];
3. Defendants Michael Rose's and Jacquelyn Schumaker's Motion for Summary Judgment [ECF #200];

1 4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].

2 This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first  
3 request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary  
4 Judgment.

5 Good cause exists for this extension. Plaintiff's counsel is requesting a sixty (60) day  
6 extension of time up to and including July 16, 2021, to respond to all parties' Motions for  
7 Summary Judgment as Plaintiff is in prison, communication must be scheduled, and the volume  
8 of the motions. Defendant has courteously granted this extension of time for Plaintiff to file his  
9 Response. Accordingly, Plaintiff shall have up to and including July 16, 2021, to respond to  
10 Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200] and [ECF  
11 #201].  
12

13 DATED this 11<sup>th</sup> day of May, 2021

DATED this 11<sup>th</sup> day of May, 2021

14 **HATFIELD & ASSOCIATES**

**KAEMPFER CROWELL**

15 */s/ Trevor J. Hatfield*  
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*/s/ Lyssa S. Anderson*  
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*Attorneys for Defendant Cesar Esparza*

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1 DATED this 11<sup>th</sup> day of May, 2021.

2 **LAURIA TOKUNAGA GATES & LINN, LLP**

3 */s/ Paul A. Cardinale*

4 By: \_\_\_\_\_  
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14 *Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his*  
15 *individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH*  
16 *(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as*  
17 *SCHULTZ") in her individual capacity, and RAYMOND MONDORA*

18 **ORDER**

19 **IT IS SO ORDERED:**

20   
21 \_\_\_\_\_  
22 UNITED STATES DISTRICT COURT JUDGE

23 Dated: May 13, 2021  
24 \_\_\_\_\_  
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